

01/26/2022

# ICC BE Workshop #4

## Development of the ComEd BE Plan

ComEd is developing and intends to submit a BE Plan that:

- puts Illinois' clean energy to work to further **reduce emissions and improve health and air quality in our communities;**
- **prioritizes inclusion of, and targeted benefits for, low to moderate income communities;** and
- **meaningfully reduces barriers to adoption** of beneficial electrification technologies for families and businesses.

To unleash the health and environmental benefits of Beneficial Electrification, we need to **overcome key adoption barriers** and ComEd is working to assess the best ways to support this effort through its BE Plan:



**Upfront Technology Costs**



**Charging Availability & Range Anxiety**



**Equitable Access**



**Customer Education & Support**



## ComEd BE Plan: Key Inputs and Considerations

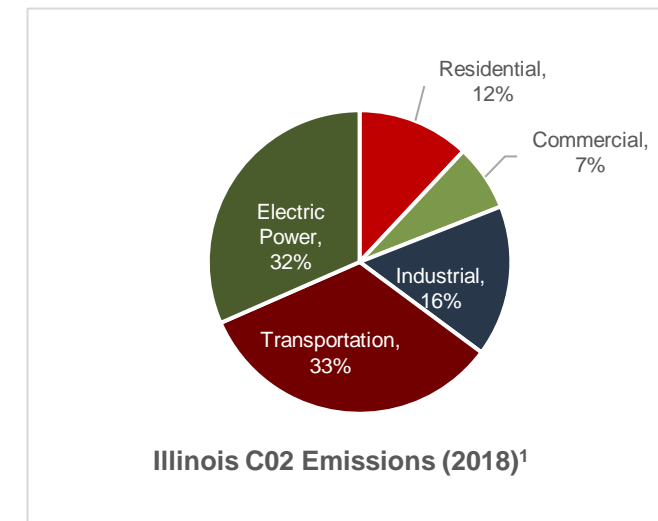
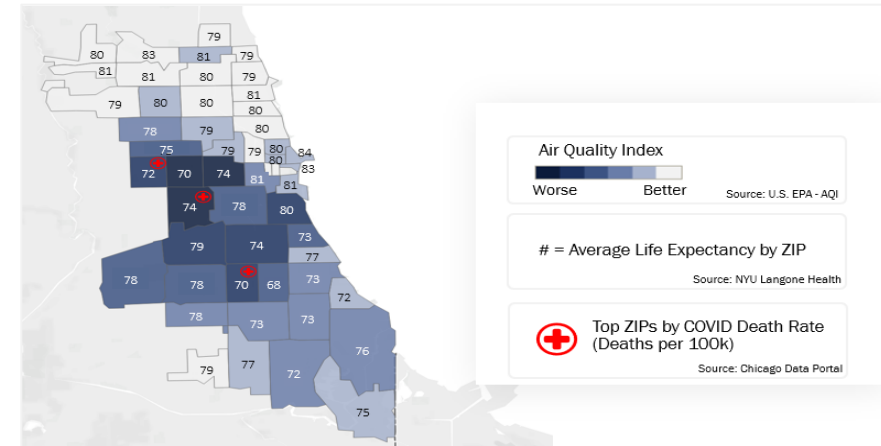
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While the Beneficial Electrification Plan (BE Plan) will be guided by the **statutory requirements** and the **benefits and barriers to electrification**, several other factors will influence the composition of the ultimate plan to be filed:

- **Stakeholder Preferences:** Stakeholders in the workshop process have been sharing their preferences and ideas. ComEd expects that this valuable input will be summarized in the workshop report for consideration by the utilities.
- **Federal Legislation:** The recently passed Infrastructure Investment and Jobs Act (IIJA) may alter and resize the set of adoption barriers customers face. This, as well as any additional federal legislation, could affect ComEd's identification and prioritization of BE programs.
- **Funding of IL EPA Programs:** The funding of the IL EPA Charging Rebate Program and the IL EPA Electric Vehicle Rebate Program is uncertain. This could affect ComEd's identification and prioritization of BE programs.
- **Rate Impact Cap:** The 2021 Illinois Clean Energy Law stipulates that “the retail rate impact from the development of electric vehicle infrastructure shall not exceed 1% per year of the total annual revenue requirements of the utility.” This rate cap could limit the funding available for BE Plan programs. As a result, the utilities will need to assess the optimal number of BE Plan programs, the optimal distribution of rate cap impacted funds, and the optimal timing/sequencing of programs to meaningfully reduce adoption barriers for customers.

## ComEd BE Plan: Key Inputs and Considerations Cont.

- **Equity:** Low-income communities, and particularly communities of color, are suffering from disproportionate exposure to high levels of localized air pollution and its accompanying health impacts, while navigating several other socio-economic inequities. ComEd is developing a BE Plan to prioritize inclusion of these communities and is also sensitive to the impact of various programs on the bills of those who can least afford these technologies.
- **Beyond Transportation:** Harmful emissions from direct end uses in residential, commercial, and industrial sectors account for over a third of Illinois' annual CO2 emissions. While transportation electrification is the low-hanging opportunity, a comprehensive Beneficial Electrification approach will be necessary to enable broad decarbonization, improve air quality, and address climate change. This could affect ComEd's identification and prioritization of BE programs in both the initial plan and future plan updates.



## Stakeholder Preferences

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ComEd is actively participating in the ongoing BE Workshops, reviewing the Stakeholder Proposals, and reviewing Stakeholder workshop presentations. These proposals provide useful insight into Stakeholder preferences. ComEd is taking note of similar proposal ideas and themes as it begins to design a plan to meet the **statutory requirements** and optimally address the **benefits and barriers to electrification**.

### Stakeholder Proposal Initial Impressions:

- **Medium- and Heavy-duty Fleet:** Many proposals encouraged developing a BE Plan focused on electrifying the medium- and heavy-duty segments of transportation, which are responsible for a disproportionate amount of air pollution relative to their population, particularly in low-income, environmental justice, and eligible communities. *ChargePoint, Chicago Transit Authority, Citizens Utility Board, Illinois Clean Jobs Coalition, Little Village Environmental Justice Organization, Warehouse Workers of America*
- **Public Transit and School Buses:** Many proposals encouraged developing a BE Plan focused on electrifying public transit and school buses segments of transportation, for similar air pollution impact reasons. *Chicago Transit Authority, Citizens Utility Board, City of Chicago, Illinois Clean Jobs Coalition*
- **Residential Incentives:** Many proposals articulated the need for additional incentives to facilitate electrification amongst residential customers. Incentives proposed ranged in size, coverage, and conditions for eligibility. *Advanced Energy Economy, Citizens Utility Board, Illinois Clean Jobs Coalition*

## Stakeholder Preferences Cont.

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- **Optimizing Fuel Cost Savings:** Many proposals encouraged taking advantage of alternative rate structures and programs, such as demand response, hourly pricing, time-of-use rates, EV-specific rates, and/or managed charging in order to enable charging such that customers optimize their fuel cost savings. *Chicago Transit Authority, Citizens Utility Board, City of Chicago, Electrify America, EV.Energy, FreeWire Technologies, FLO Services, GreenWays2Go, Illinois Competitive Energy Association, Illinois Clean Jobs Coalition, Joint EV Industry Parties, WeaveGrid*
- **Public Charging Availability:** Several proposals presented ideas to increase the availability of publicly available charging to enable broad adoption, especially for customers without access to home charging. *Alliance for Automotive Innovation, City of Highland Park, Community Charging Initiative*
- **Education:** Many proposals highlighted the needs of education and awareness programs to facilitate beneficial electrification. These range from educating new drivers to assisting fleet managers. *ChargePoint, City of Chicago, Climate Reality Project, Fox Valley Electric Auto Association, GreenWays2Go, Metropolitan Mayors Caucus, National Energy Foundation, NRG Energy*

**ComEd also recognizes and appreciates the variety of stakeholders participating in these workshops. ComEd thanks all stakeholders for taking the time to share their preferences, experiences, and expertise.**